

Exhibit 16

Deposition of Lorenzo J. Fertitta

(March 23, 2017)

(excerpted)

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon)
Fitch, on behalf of)
themselves and all others)
similarly situated,)
)
Plaintiffs,)
)
v.) Lead Case No.
) 2:15-cv-01045-RFB-(PAL)
Zuffa, LLC, d/b/a Ultimate)
Fighting Championship and)
UFC,)
)
Defendant.)
_____)

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF LORENZO J. FERTITTA

Las Vegas, Nevada

March 23, 2017

9:09 a.m.

REPORTED BY:
CYNTHIA K. DuRIVAGE, CSR #451
JOB NO. 49608

284

1 A. No.
2 Q. And that's because they're independent
3 contractors, correct?

4 A. My understanding, and I'll be honest, I'm
5 not versed in labor law by any way, shape, or form,

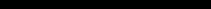
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1. **Introduction**
 2. **Background**
 3. **Methodology**
 4. **Results**
 5. **Discussion**
 6. **Conclusion**
 7. **References**
 8. **Appendix**
 9. **Figure 1**
 10. **Figure 2**
 11. **Figure 3**
 12. **Figure 4**
 13. **Figure 5**
 14. **Figure 6**
 15. **Figure 7**
 16. **Figure 8**
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 210. **Figure 202**
 211. **Figure 203**
 212. **Figure 204**
 213. **Figure 205**
 214. **Figure 206**
 215. **Figure 207**
 216. **Figure 208**
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285

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[REDACTED]

1. **Identify the main topic of the text.**
 2. **Summarize the main points of the text.**
 3. **Identify the author's purpose.**
 4. **Identify the target audience.**
 5. **Identify the main argument.**
 6. **Identify the supporting evidence.**
 7. **Identify the conclusion.**
 8. **Identify the main theme.**
 9. **Identify the main message.**
 10. **Identify the main idea.**

1. **Introduction**
 2. **Background**
 3. **Methodology**
 4. **Results**
 5. **Discussion**
 6. **Conclusion**
 7. **References**
 8. **Appendix**
 9. **Index**
 10. **Table of Contents**
 11. **Figure 1**
 12. **Figure 2**
 13. **Figure 3**
 14. **Figure 4**
 15. **Figure 5**
 16. **Figure 6**
 17. **Figure 7**
 18. **Figure 8**
 19. **Figure 9**
 20. **Figure 10**
 21. **Figure 11**
 22. **Figure 12**
 23. **Figure 13**
 24. **Figure 14**
 25. **Figure 15**
 26. **Figure 16**
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 28. **Figure 18**
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 30. **Figure 20**
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 32. **Figure 22**
 33. **Figure 23**
 34. **Figure 24**
 35. **Figure 25**
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 161. **Figure 151**
 162. **Figure 152**
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 164. **Figure 154**
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 167. **Figure 157**
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 171. **Figure 161**
 172. **Figure 162**
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 178. **Figure 168**
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 180. **Figure 170**
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 182. **Figure 172**
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 209. **Figure 199**
 210. **Figure 200**
 211. **Figure 201**
 212. **Figure 202**
 213. **Figure 203**
 214. **Figure 204**
 215. **Figure 205**
 216. **Figure 206**
 217. **Figure 207**
 218

72 (Pages 282 to 283)

WORLDWIDE, INC.
New York, NY 10123 1.800.642.1099

LORENZO J. FERTITTA - CONFIDENTIAL

<div>286</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 that.</div> <div>11 As a standard tool for management, we had</div> <div>12 what we'll call minimums. And what that would mean</div> <div>13 was that most fighters when they first come in in</div> <div>14 their first fight in the UFC -- once again, not all</div> <div>15 but most fighters would sign for what we would call a</div> <div>16 minimum amount, which I believe is 10,000 to show,</div> <div>17 10,000 to win, it could be 12,000 to show, 12,000 to</div> <div>18 win. I don't know where it is right now.</div> <div>19 Q. Could you look at Exhibit 24, page 33 of</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div> <div>26 [REDACTED]</div> <div>27 [REDACTED]</div> <div>28 [REDACTED]</div> <div>29 [REDACTED]</div> <div>30 [REDACTED]</div> <div>31 [REDACTED]</div> <div>32 [REDACTED]</div> <div>33 [REDACTED]</div> <div>34 [REDACTED]</div> <div>35 [REDACTED]</div> <div>36 [REDACTED]</div> <div>37 [REDACTED]</div> <div>38 [REDACTED]</div> <div>39 [REDACTED]</div> <div>40 [REDACTED]</div> <div>41 [REDACTED]</div> <div>42 [REDACTED]</div> <div>43 [REDACTED]</div> <div>44 [REDACTED]</div> <div>45 [REDACTED]</div> <div>46 [REDACTED]</div> <div>47 [REDACTED]</div> <div>48 [REDACTED]</div> <div>49 [REDACTED]</div> <div>50 [REDACTED]</div> <div>51 [REDACTED]</div> <div>52 [REDACTED]</div> <div>53 [REDACTED]</div> <div>54 [REDACTED]</div> <div>55 [REDACTED]</div> <div>56 [REDACTED]</div> <div>57 [REDACTED]</div> <div>58 [REDACTED]</div> <div>59 [REDACTED]</div> <div>60 [REDACTED]</div>	<div>288</div> <div>1 [REDACTED]</div> <div>2 [REDACTED]</div> <div>3 [REDACTED]</div> <div>4 [REDACTED]</div> <div>5 [REDACTED]</div> <div>6 [REDACTED]</div> <div>7 [REDACTED]</div> <div>8 [REDACTED]</div> <div>9 [REDACTED]</div> <div>10 [REDACTED]</div> <div>11 [REDACTED]</div> <div>12 [REDACTED]</div> <div>13 [REDACTED]</div> <div>14 [REDACTED]</div> <div>15 [REDACTED]</div> <div>16 [REDACTED]</div> <div>17 [REDACTED]</div> <div>18 [REDACTED]</div> <div>19 [REDACTED]</div> <div>20 [REDACTED]</div> <div>21 [REDACTED]</div> <div>22 [REDACTED]</div> <div>23 [REDACTED]</div> <div>24 [REDACTED]</div> <div>25 [REDACTED]</div> <div>26 [REDACTED]</div> <div>27 [REDACTED]</div> <div>28 [REDACTED]</div> <div>29 [REDACTED]</div> <div>30 [REDACTED]</div> <div>31 [REDACTED]</div> <div>32 [REDACTED]</div> <div>33 [REDACTED]</div> <div>34 [REDACTED]</div> <div>35 [REDACTED]</div> <div>36 [REDACTED]</div> <div>37 [REDACTED]</div> <div>38 [REDACTED]</div> <div>39 [REDACTED]</div> <div>40 [REDACTED]</div> <div>41 [REDACTED]</div> <div>42 [REDACTED]</div> <div>43 [REDACTED]</div> <div>44 [REDACTED]</div> <div>45 [REDACTED]</div> <div>46 [REDACTED]</div> <div>47 [REDACTED]</div> <div>48 [REDACTED]</div> <div>49 [REDACTED]</div> <div>50 [REDACTED]</div> <div>51 [REDACTED]</div> <div>52 [REDACTED]</div> <div>53 [REDACTED]</div> <div>54 [REDACTED]</div> <div>55 [REDACTED]</div> <div>56 [REDACTED]</div> <div>57 [REDACTED]</div> <div>58 [REDACTED]</div> <div>59 [REDACTED]</div> <div>60 [REDACTED]</div>
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73 (Pages 286 to 289)

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LORENZO J. FERTITTA - CONFIDENTIAL

<p style="text-align: right;">290</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 Bellator made him a significant offer that ended up</p> <p>16 being very much to his advantage.</p> <p>17 Q. But he, nevertheless, ended up contracting</p> <p>18 with UFC, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Would you look at page 75 of Exhibit 24,</p> <p>21 please. That's at ZFL-1897726.</p> <p>22 A. Yes.</p> <p>23 Q. And if you go down to about the middle of</p> <p>24 the page, in the first-hand column in the from,</p> <p>25 there's a text from Dana White to your 6097 number,</p>	<p style="text-align: right;">292</p> <p>1 and 'other dude' is fuckin' badass.</p> <p>2 Fuckin' cut throat nasty business</p> <p>3 like you see in the movies. Good</p> <p>4 shit, homie. Congrats."</p> <p>5 And what's your response there? Would you</p> <p>6 read that, please.</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 Q. All right. I think -- why don't we take a</p> <p>16 break. We're coming to a close on our record time.</p> <p>17 THE VIDEOGRAPHER: We're going off the</p> <p>18 record at approximately 5:26 p m.</p> <p>19 (A recess was taken.)</p> <p>20 THE VIDEOGRAPHER: We're going back on the</p> <p>21 record. The time is approximately 5:37 p m.</p> <p>22 MR. DELL'ANGELO: So we'll note for the</p> <p>23 record that in light of counsel's objections about</p> <p>24 the introduction of publicly available documents that</p> <p>25 were not produced in discovery, the fact that the</p>
<p style="text-align: right;">291</p> <p>1 that's February 25, 2014 at 7:00 and 4 seconds p m.</p> <p>2 Do you see that?</p> <p>3 A. I do.</p> <p>4 Q. And as you read across, it seems to refer</p> <p>5 to negotiations that you had with a Melendez and</p> <p>6 another dude.</p> <p>7 Do you have an understanding of what</p> <p>8 Mr. White is referring to there?</p> <p>9 A. Yes.</p> <p>10 Q. What is he referring to?</p> <p>11 A. He's referring to -- I believe he's</p> <p>12 referring to Eddie Alvarez who was a Bellator</p> <p>13 fighter.</p> <p>14 Q. He would be the other dude?</p> <p>15 A. Eddie, I'm assuming, was the other dude</p> <p>16 because he had done the same thing but in Bellator</p> <p>17 where he had decided to fight out the last contract</p> <p>18 in Bellator and test the free agency market.</p> <p>19 Q. And Mr. White's text continues through the</p> <p>20 next line. Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. I'll read the two texts for you. It says:</p> <p>23 "Bro, you know I love you to</p> <p>24 fuckin' death as it is, but what you</p> <p>25 pulled off this week with Melendez</p>	<p style="text-align: right;">293</p> <p>1 Mercer issue has not been resolved and that we have</p> <p>2 not received a privilege log, we're not going to</p> <p>3 close the deposition, but we don't have any further</p> <p>4 questions subject to those issues.</p> <p>5 MR. ISAACSON: I will note that the</p> <p>6 objection to which you referred to, I did not -- I</p> <p>7 did not stop you from asking any of your questions on</p> <p>8 the basis of that objection in all of your questions.</p> <p>9 You had the ability to ask all of your questions.</p> <p>10 Are you done?</p> <p>11 MR. DELL'ANGELO: Yes.</p> <p>12 MR. ISAACSON: Okay.</p> <p>13 THE VIDEOGRAPHER: No further questions</p> <p>14 from anyone?</p> <p>15 MR. ISAACSON: I'm going to just ask a few</p> <p>16 questions while we're here.</p> <p>17</p> <p>18 EXAMINATION</p> <p>19 BY MR. ISAACSON:</p> <p>20 Q. Do you have Exhibit 29 -- actually,</p> <p>21 Exhibit 27, sir?</p> <p>22 A. Yes.</p> <p>23 Q. Exhibit 27 was an article that you were</p> <p>24 shown with comments about Dana White and Quinton</p> <p>25 "Rampage" Jackson, and you were asked to look at the</p>

74 (Pages 290 to 293)